

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

EVERETTE CADDEN, )  
                        )  
Plaintiff,           )  
                        )  
v.                     )      Case No.: 1:22-CV-347-PTG-JFA  
                        )  
UNITED STATES OF AMERICA, )  
                        )  
Defendant.           )  
                        )

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**DEFENDANT'S WITNESS LIST**

Pursuant to this Court's June 17, 2022 Order, Defendant, through its undersigned counsel, hereby respectfully submits its list of potential witnesses for the trial in the above-captioned matter.

**WITNESSES**

In accordance with Federal Rule 26(a)(3), the witnesses listed below who are marked with an asterisk are those Defendant expects to present at trial. The additional witnesses designated are those Defendant may call if the need arises. Defendant reserves the right to seek to present the testimony of such witnesses virtually through technological means. Defendant also reserves the right to seek to present the testimony of such witnesses by de bene esse deposition or through discovery deposition testimony if the witness in question is, unbeknownst to Defendant at the present time, unavailable for trial either in person or virtually.

The witness list below reflects the present status of this litigation. Accordingly, Defendant reserves the right to amend this list—including eliminating proposed witnesses—should further litigative developments (including, *inter alia*, positions advanced by Plaintiff) warrant.

1.       Dr. Eliana Anderson
2.       Dr. Gustavo Arocha

3. Everette Cadden\*
4. Dr. Andrew Chapman\*
5. Dr. Ivica Ducic\*
6. Dr. James Houseworth\*
7. Dr. Porscha Kinlaw\*
8. Dr. Ian Lam\*
9. Dr. Kyung Cheon Min
10. Dr. Garry Myers\*
11. Dr. Amparo Pinzon-Avellaneda\*
12. Dr. Michael Pollowitz\*
13. Dr. Neil Porter\*
14. Evelin Portillo
15. Dr. Salar Sanjari\*
16. Dr. Hasnain Shinwari\*
17. Dr. Damon Watson\*
18. Stephen Woof\*
19. Any other witnesses necessary to authenticate records and/or establish the manner in which records were kept.

20. Any other witnesses designated by Plaintiff to whom Defendant does not object.

Defendant may also call other witnesses necessary to respond to any testimony offered by Plaintiff which was not previously disclosed.

Date: November 15, 2022

Respectfully submitted,

JESSICA D. ABER

UNITED STATES ATTORNEY

By: \_\_\_\_\_ /s/ \_\_\_\_\_

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